



Indiana Department of Education

SUPPORTING STUDENT SUCCESS

February 21st, 2011

Dr. Jeff Swensson, Superintendent
Carmel Clay Schools
5201 East Main Street
Carmel, IN 46033

Dear Dr. Swensson:

On December 15, 2010, the Indiana Department of Education's (IDOE) English Learning & Migrant Education staff commenced an on-site monitoring review of Carmel Clay Schools' administration of the Title III of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB), and the State of Indiana Non-English Speaking Program (NESP). Enclosed is a report based upon those reviews.

Prior to, during, and following the on-site monitoring review, the IDOE staff conducted a number of activities (described in the attached report) to verify compliance with the programmatic requirements of Title III and the State of Indiana Non-English Speaking Program.

The enclosed report summarizes the results of the on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, specific documentation as requested. IDOE will review the documentation and determine if it is sufficient to remove or remedy any identified compliance issues.

In all cases where there are findings of non-compliance, Carmel Clay Schools **is responsible for taking appropriate action to remedy compliance issues**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, Carmel Clay Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE is available to provide technical assistance as requested.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Carmel Clay Schools with improving the delivery of Title III and NESP services.

Sincerely,

Mary Gardner, ELL Specialist
Division of Student Learning
Indiana Department of Education
mgardner@doe.in.gov

cc: Alyson Luther, Title III Director, Division of Student Learning, Indiana Department of Education
Amy Dudley, Title III/NESP Program Administrator, Carmel Clay Schools

**Indiana Department of Education
Title III and Non-English Speaking Program Monitoring**

District: Carmel Clay Schools

Monitoring Staff: Angela Mello & Mary Gardner, EL Specialists, Office of English Learning & Migrant Education, Division of Student Learning, IDOE.

The Indiana Department of Education (IDOE) commenced on-site monitoring of Carmel Clay Schools on December 15, 2010. The purpose of the on-site monitoring visit was to identify areas of strength, areas in need of improvement, and areas of non-compliance with regards to the Title III and Non-English Speaking Program requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic		Statutory Citation
1.1	Compliance with the English Language Proficiency Assessment requirements	NCLB, Title III §3113 NCLB, Title III §3116 (C)
1.2	Compliance with requirements specific to meeting the Annual Measurable Achievement Objectives (AMAOs)	NCLB, Title III §3122(a)(1-3) NCLB, Title III §3116 (2) & (3) (A) NCLB, Title III §3111(b)(2)(B)
1.4	Compliance with the English Language Proficiency (ELP) Standards requirements	NCLB, Title III §3113 NCLB, Title III §3102
1.5	Compliance with Data Collection and Reporting requirements	NCLB, Title III §3121 NCLB, Title III §3123
2.1	Compliance with requirements for English Language Acquisition and Language Enhancement Programs	NCLB, Title III §3111 (b)(2) NCLB, Title III §3115
2.3	Non-Public School Participation	NCLB, Title IX, Part E
2.4	Compliance with Parental Notice and Outreach requirements	NCLB, Title III §3302 NCLB, Title III §3115 (d) (6)
2.5	Compliance with Program Design and Implementation requirements	NCLB, Title III §3115

During the on-site visit, IDOE spent time interviewing the Title III/NESP Program Administrator of Carmel Clay Schools, the Director of Curriculum, Instruction, and Assessment and the Superintendent of Carmel Clay Schools. In addition, IDOE visited Orchard Park Elementary School and Carmel Middle School where observations and interviews were conducted with EL staff, general classroom teachers and school principals. IDOE also reviewed documents from Carmel Clay Schools including district ESL policies and procedures, district notices to parents and student record information. Based on the above information, the report follows.

Monitoring Topic I.1: Compliance with NCLB, Title III Compliance with the English Language Proficiency Assessment Requirements

Statutory Requirements are contained in sections 3113 and 3116

Background

IDOE interviewed the Superintendent, the Title III/ NESP Program Administrator, and the Director of Curriculum, Instruction, and Assessment regarding compliance with the English Language Proficiency Assessment requirements.

Areas of Compliance, Recommendations, & Required Actions

Home Language Survey Implementation (I.1.1):

Carmel Clay Schools' Home Language Survey is a section of the Student Registration Form. This is administered to all kindergarten parents and to parents enrolling their students in Carmel Clay Schools for the first time. This document is then kept in the student's cumulative folder for easy access. The Home Language is provided in English, and Carmel Clay Schools uses a translation service called Language Line if they need to explain the enrollment process to a family.

Recommendation (I.1.1): The IDOE suggests that the Home Language Survey be translated from English into at least three of the most predominant languages at Carmel Clay Schools: Spanish, Mandarin, and Japanese. The Home Language Survey is a very important document and it is critical that parents understand it clearly. This will help parents make sure they are answering the HLS accurately and will help Carmel Clay Schools provide the appropriate services for their students.

Required Action: By April 1, 2011, Carmel Clay Schools must submit evidence that the Home Language Survey has been translated into the three most predominant languages represented in their student population.

English Language Proficiency Placement Assessment (I.1.2, I.1.3, I.1.4):

At Carmel Clay Schools, the ENL teachers administer the LAS Links Placement Test. They are trained using the LAS Links Connecting Assessment, Language, and Learning PowerPoint from CTB/McGraw-Hill. This training is led by the Title III Program Administer and the Director of Curriculum, Instruction, and Assessment. All kindergarten students or students new to the state of Indiana who have indicated that English is not their primary language on their Home Language Survey take the LAS Links Placement Assessment.

English Language Proficiency Annual Assessment (I.1.5):

Each January, the Title III/NESP Director holds an ESL LAS Links Assessment Training for the ENL teachers, ENL Instructional Assistants, and licensed substitute teachers who will be giving the annual assessment. This includes the McGraw-Hill Training PowerPoint, "LAS Links: Connecting Assessment, Language, and Learning." The substitute teachers go from school to school administering the assessment. All LEP students take the LAS Links Annually until they have received an overall score of 5 for two consecutive years.

Data Reporting (I.1.6):

ENL teachers and school secretaries at each school work together to submit language proficiency information for new students to the district. Current student information is kept up to date at the district level. The school secretaries then enter any new information into PowerSchool. Chris Reinking, the Data Support Specialist, then pulls the information from Powerschool and Amy Dudley checks the information and makes sure no errors exist. Once the information has been verified, Chris Reinking runs the DOE-LM report and submits it to the Indiana Department of Education.

Findings of Non-Compliance and Required Actions for Monitoring Topic I.1

There are no findings for Monitoring Topic I.1.

**Monitoring Topic I.2:
Annual Measurable Achievement Objectives (AMAOs)**

Statutory Requirements are contained in Section 3122(a)(1-3) and Section 3111 (b)(2)(B)

Background

IDOE interviewed the Superintendent, the Title III/ NESP Program Administrator, and the Director of Curriculum, Instruction, and Assessment regarding the delivery of English language development services as they relate to meeting the Annual Measurable Achievement Objectives (AMAOs).

Areas of Compliance, Recommendations, & Required Actions**English Language Development Services in ESL and Content Area Classes (I.2.1):**

Data is utilized in several ways to ensure that limited English proficient students are meeting the AMAOs. Students receive a diagnostic assessment, such as the DRA, at the beginning of the year. Students are then assessed continuously throughout the year. Benchmark exams also take place at least three times during the school year. This data is then analyzed by the general education teachers and the EL staff. Teachers use these assessments to plan appropriate instruction and if necessary, intervention for their EL students. Carmel Clay Schools also strives to create fluid channels of communication between their general classroom teachers and EL staff. Assessments used for monitoring are curriculum based measures, MAZE, LNF, PSF, NWF, LSF, the DRA, and the Reads benchmark. ENL teachers have created a shared drive for all teachers, which allow them to access all necessary accommodations and modifications necessary for each student. ENL teachers have also placed examples of these modifications, such as highlighted directions and example problems to assist teachers in meeting the needs of their students and the AMAO goals of the district.

AMAO Determinations (1.2.2):

The district office of Carmel Clay Schools receives the AMAO report and shares the data with all of their principals. They discuss what AMAOs are and how they will continue to meet these goals. Principals then share the AMAO information on data collaboration days with their entire school staff.

Findings of Non-Compliance and Required Actions for Monitoring Topic 1.2

There are no findings for Monitoring Topic 1.2.

<p style="text-align: center;">Monitoring Topic 1.4: Compliance with the English Language Proficiency (ELP) Standards Requirements</p>

Statutory Requirements are contained in Section 3113

Background

IDOE interviewed the Title III/NESP Program Administrator, the Director of Curriculum, Instruction, and Assessment, principals, teachers and the corporation's ESL staff regarding usage of the English Language Proficiency Standards.

Areas of Compliance, Recommendations, and Required Actions**Training and Technical Assistance (1.4.1):**

A group of high school teachers with an interest in teaching strategies for EL students have formed a Professional Learning Community called the ENL Cadre. This group meets monthly to look at and discuss best practices for working with EL students. These educators then take what they have learned back to their colleagues. Coaching is often available for general education teachers during each site's collaboration time. Professional Development at each site often involves pulling chapters from different books including Double the Work: Challenges and Solutions to Acquiring Language and Academic Literacy for Adolescent English Language Learners and The Help! Kit: A Resources Guide for Secondary Teachers of Migrant English Language Learners. SIOP Strategies are also being introduced at the secondary level. Martha McFarland, the Director of Curriculum, Instruction, and Assessment meets monthly with EL instructors to go over SIOP implementation.

Ongoing Use of the English Language Proficiency Standards (1.4.2):

EL teachers meet with general education teachers to create each student's Individual Learning Plan and to go over the English Language Proficiency Standards. The ELP standards and the ILPs are then put on the shared drive where they can be constantly updated. The ENL teachers have also put examples of what many of the ELP standards look like when being assessed on the shared drive as resources for classroom teachers. At the high school level, each student is involved in their own ILP creation, to create ownership and open communication between the student and their teachers.

Findings of Non-Compliance and Required Actions for Monitoring Topic 1.4

There are no findings for Monitoring Topic 1.4.

Monitoring Topic 1.5: Compliance with Data Collection and Reporting Requirements

Statutory Requirements are contained in Section 3121 and 3123; EDGAR 34 and CFR 76.731.

Background

IDOE interviewed the Superintendent, the Title III/ NESP Program Administrator, and the Director of Curriculum, Instruction, and Assessment regarding the formal data reporting process specific to English Learners (EL).

Areas of Compliance, Recommendations, and Required Actions

DOE-LM Reporting (1.5.1):

ENL teachers and school secretaries at each school work together to submit language proficiency information for new students to the district. Current student information is kept up to date at the district level. The school secretaries then enter any new information into PowerSchool. Chris Reinking, the Data Support Specialist, then pulls the information from Powerschool and Amy Dudley checks the information and makes sure no errors exist. Once the information has been verified, Chris Reinking runs the DOE-LM report and submits it to the Indiana Department of Education.

DOE-LM Discrepancy Process (1.5.2):

Any discrepancies of DOE-LM are printed out by the Data Support Specialist. The Data Support Specialist contacts Amy Dudley and they work together to identify what has caused the discrepancy and how to fix it. Once the discrepancy has been fixed, the information is resubmitted to the IDOE.

Findings of Non-Compliance and Required Actions for Monitoring Topic 1.5

There are no findings for Monitoring Topic 1.5.

Monitoring Topic 2.1: Compliance with requirements for English Language Acquisition and Language Enhancement Programs: Programmatic Support

Statutory Requirements are contained in Section 311 (b)(2)

Background

IDOE interviewed the Title III/NESP Program Administrator, the Director of Curriculum, Instruction, and Assessment, the Superintendent, ESL staff and general education teachers regarding English language development programs.

Areas of Compliance, Recommendations, and Required Actions

Use of Professional Development Provided by the State (2.1.1):

Carmel Clay Schools sent thirteen ENL teachers to the ELL State Conference on November 3rd, 2010. Carmel Clay Schools also uses the LAS Links PowerPoints to train those administering the LAS Links Placement and Proficiency tests. The AMAO PowerPoint from the IDOE is also shown to principals and administrators once the AMAO results are released.

Collaboration (2.1.3):

At the elementary level collaboration is fluid and frequent. General education teachers, the EL teachers, and the instructional assistants are in constant contact. IA's and EL teachers push into classrooms and pull students out for small group instruction. Both the EL staff and the general education teachers are frequently monitoring the process and needs of their students. The services a student receives is based upon their LAS Links scores and on bi-weekly progress monitoring and discussions between the staff.

At the middle school level, collaboration between the EL staff and the general education teachers was described as positive and comfortable. The EL teacher takes time out of her own preparation period to go into the classroom and check in with the general education teachers. Email is also a popular way for teachers to discuss instructional strategies and student concerns. The instructional assistants attend English/Language Arts and Social Studies classes with the 8th grade Level 1 and 2 students to provide extra support as they prepare for high school. This also gives IAs a chance to work collaboratively with the general classroom teacher. Level 4 students do not attend an EL class, but receive support through an ENL study hall and the modifications listed in their ILPs. This is another chance for collaboration between the EL staff and the general education teachers. The general education teachers provide input about specific standards the students need help with, and it is provided through study hall. The Hampton-Brown curriculum has also been mapped to the Common Core with the ELP Standards, providing teachers an excellent resource to use to structure their lesson plans for EL students.

At the high school level, there is an EL teacher and two instructional assistants that spend time going into classrooms daily. This allows for many opportunities for discussion and collaboration with the mainstream teachers. The EL teacher has a 90 minute monitoring time each day. She goes into the general education classrooms to monitor her EL students' progress and to talk with their teachers. The instructional assistants spend the bulk of their day in sheltered education classrooms and act as the eyes and ears for the teachers, while also collaborating with teachers to provide the best support possible for EL students. Carmel High School also has Student Resource Time (SRT) every other "gold day." This is additional time the EL teacher has to work with her EL students with input from the general classroom teachers.

Findings of Non-Compliance and Required Actions for Monitoring Topic 2.1

There are no findings for Monitoring Topic 2.1.

Monitoring Topic 2.4: Compliance with Parental Notice and Outreach Requirements

Statutory Requirements are outlined in Title III, Section 3302 and Title VI 34 C.F.R. § 100.3 (a)(b).

Background

IDOE interviewed the Superintendent, principals, teachers, ESL staff, the Title III/ NESP Program Administrator, and the Director of Curriculum, Instruction, and Assessment regarding parental notification and outreach.

Areas of Compliance and Recommendations

Annual Parental Notification (2.4.1):

ENL teacher, Margaret Jackson, ensures that the annual parent notification letter is sent no later than 30 days after the beginning of the school year (or within two weeks of late enrollment). Copies of this letter in English and Spanish were presented as evidence.

Parental Outreach (2.4.2):

Important documents, including school newsletters, are translated and sent home to families. Whenever possible, Carmel Clay Schools uses translators for parent meetings. There is a district-wide contact information sheet with all the parents of EL students. This list is used to hold District-wide ENL Nights, including an ENL Literacy Night. Each school's Parent-Teacher Organization serves as outreach for ENL families. A representative from the PTO will call the newly arrived family, answer any questions they may have, and invite them to school events. Many schools also hold international festivals where parents can have booths representing their home countries. Carmel Clay Middle School has a parent group called International Friends. This group is made up of ENL parents, and is led by a Carmel Clay parent volunteer. The purpose of this group is to help ENL families connect with the schools and the community. Parents go on trips around Indianapolis together, share their talents, learn idioms and slang, and have Adult English Language Instruction classes using an adapted curriculum from the high school.

Recommendation (2.4.2):

Carmel Clay Schools needs to create and distribute a Parent Survey of Needs. This will be an effective means of outreach to parents of LEP students, and will foster the relationship between these parents and the school. It will also provide schools with important information about their LEP students.

Required Action: By April 1, 2011, Carmel Clay Schools must provide a Parent Needs Survey and a plan for how it will be implemented across the district.

Findings of Non-Compliance and Required Actions for Monitoring Topic 2.4

There are no findings for Monitoring Topic 2.4.

Monitoring Topic 2.5: Compliance with Program Design and Implementation Requirements

Statutory Requirements are contained in Section 3115.

Background

IDOE interviewed the Title III/ NESP Program Administrator, the Director of Curriculum, Instruction, and Assessment, principals, ESL staff and general education staff regarding program design and implementation requirements.

Areas of Compliance and Recommendations

Classified Staff are Fluent in English (2.5.1):

All classified staff members at Carmel Clay Schools who work with ELs are fluent in English based upon their degrees.

Certified Staff are Fluent in English (2.5.2)

The human resources policy document ensures that all teachers at Carmel Clay Schools are Highly Qualified.

Supervision of Instructional Paraprofessionals (2.5.3):

ENL teachers and classroom teachers create all lesson plans used by the Instructional Assistants. Intervention teachers and school principals periodically complete an observation using an Intervention Fidelity Check document to ensure that instructional assistants are working under the direct supervision of a certified teacher in an effective, productive way.

English Language Development Program Model (2.5.4):

Detailed below are programs and services observed at each school.

Elementary (K-5): The instructional assistant pulls out students who are Level 1s, 2s, and sometimes Level 3s for English-Language Development services using the On Our Way to English curriculum. These students are pulled out for 30 minutes five days a week. Students who are Level 4s and some Level 3s receive push-in support. Some students, depending upon their LAS Links, benchmark data or teacher referral are pulled out for an additional 30 minute reading intervention using Rigby Intervention. The students usually miss silent reading time when they are pulled out of the general classroom. Their progress is monitored bi-weekly and their grouping is subject to change. Some students are also pulled out for small group math support using the Everyday Math curriculum. During the general classroom's period of English/Language Arts instruction, teachers use fluid comprehension groups based upon the student's reading level. This allows students to use appropriately leveled texts so they may focus on the skill at hand, and to receive more one-on-one and small group support from the teacher or IA. All students in grades K-3 read with an adult on a daily basis.

Middle School (6-8): At the middle school level, the Hampton Brown curriculum has been mapped to the Common Core and ELP standards. There is a map for beginning ENL students and intermediate ENL students. The Reader's Journey program is used for students in grades 6-7 and the Plugged into Reading program is used for 8th grade students. Students who are

Levels 1-3 have an English class with the EL teacher that replaces the regular ELA class. This class is currently implementing SLOP components to better address the needs of EL students. Level 4 students do not have a specific class they attend for ELD services, but receive extra support throughout the day in class. Level 4 students attend an ENL study hall with Level 1-3 students. The EL teacher leads the study hall with support from the instructional assistants. The EL teacher receives input from the general classroom teacher to know where students need support. It also gives students a chance to work with the EL teacher one-on-one. In general education classes, teachers use leveled readers and the instructional assistants often pull small groups in-class for extra help. The instructional assistants also modify assessments and assignments when necessary. Some teachers also use the A-ha! supplemental vocabulary program to create more manageable vocabulary lists. Instructional assistants generally go to English-Language Arts classes and Social Studies classes with Level 1 students. They try to focus on 8th grade students as they prepare to make the transition to high school.

High School (9-12): There is an EL teacher and two instructional assistants who work with EL students at the high school. Carmel High School is on a block schedule and the EL teacher teaches two 90 minute blocks each day. The first block is a combination of ENL 9 and English 9, which is attended by students at Levels 1 and 2. The second block is a combination of ENL 10 and English 10, and is primarily for students at Level 3. The EL teacher also has Student Resource Time every other “gold” day. This is a block where students Levels 1-4 receive extra support from the EL teacher. She can help with assignments and projects, or anything else the student’s general classroom teacher feels they are struggling with. The EL teacher also has a 90 minute monitoring block, where she monitors students in their general education classrooms and talks with their general classroom teachers about best strategies or student needs. The instructional assistants go into sheltered classroom and work with the students as needed. Carmel High School uses the data system “Pinnacles” to help EL staff and general classroom teachers monitor EL student progress.

Instruction and Assessment Adaptations (2.5.5):

An ILP is created for all LEP students. The ENL teacher creates a draft of the ILP, which is then presented to the student’s general education teacher/s. The plan is then modified through the collaboration of the ENL teacher and general education teacher/s. At the high school level, the EL student is also involved in the collaborative process. Accommodations are based upon providing the student the right amount of support so that they will be successful. The ILPs are fluid documents that may be modified throughout the year based on student need. The ILPs are placed on the shared drive, to facilitate access for all stakeholders. Ongoing professional development is provided for educators who work with EL students to make sure they understand how to use them and accommodate for their students.

Reclassification (2.5.6):

Carmel Clay Schools monitors students beginning with their first annual score of 5 on the LAS Links proficiency assessment, and continues to monitor for a 3 year period. An ENL teacher monitors students who have received one or two 5s on their LAS Links Annual test. The ENL teachers use test scores, grades, a D&F form for monitoring grades, teacher feedback, parent feedback, and graduation requirements to monitor their students using a monitoring form. The ENL teachers check-in on a quarterly basis to make sure students in their monitoring period are successful in school and follow up if assistance is needed. At the High School, the counselor is also involved in the monitoring process to ensure students are on track for meeting graduation requirements.

Scheduling (2.5.7):

At the elementary school, students are placed into the classroom that will best meet their needs. At the middle school, students are grouped by teacher and class. This allows the IAs to help the greatest number of students possible. Students are also scheduled for Beginning ENL or Intermediate ENL classes depending on the student's LAS Links Level. At the high school, students are scheduled very carefully to make sure they are meeting all of their graduation requirements and receiving all of the ELD support necessary.

Retention (2.5.8):

Retaining LEP students is very rare and currently Carmel Clay Schools has no LEP students who have been retained. Carmel Clay Schools works hard to ensure that students are not retained based upon their level of language proficiency. Students who are at risk of retention are monitored and will receive extra supports from the school staff. They receive classroom modifications including teacher lesson delivery, assignments, homework and formal assessments. Students at risk of being retained also receive extra support through the specific modifications spelled out in their Individual Learning Plans.

Special Education Referrals (2.5.9):

Carmel Clay Schools are very careful about placing EL students in Special Education and work to make sure a student is not referred for a language issue. A three phase ESL Intervention Checklist must be completed before a Special Education Referral is ever made. After this checklist has been filled out, the student must go through intensive interventions. Martha McFarland, the Director of Curriculum, Instruction and Assessment works with teachers to make sure every student receives the appropriate materials, has received intervention support, and has had a psycho-academic evaluation. The referral for Special Education can be requested by a teacher or parent. There must be consent for testing from the parent and testing is given in the student's native language. 36 LEP students are currently receiving Special Education services.

Collaboration across Programs (2.5.10):

Orchard Park Elementary, Forest Dale Elementary, and Carmel Elementary receive Title I funding. This means that all students, including ELs, will receive extra support and assistance from this program. Schools work to braid their Title I and Title III programs to best support their students. Special education and intervention programs also include EL students when appropriate.

**Findings of Non-Compliance and Required Actions for
Monitoring Topic 2.5**

There are no findings for Monitoring Topic 2.5.